REMARKS

Claims 1-3, 5-11, 13-21, and 23-27, all the claims pending in the application stand rejected on prior art grounds. Applicants respectfully traverse these objections/rejections based on the following discussion.

I.   The Prior Art Rejections

Claims 1-3, 5, 8, 10, 11, 13, 16, 19-21, 23 and 26 stand rejected under 35 U.S.C. §103(a) as being unpatenable over Ireland et al, hereinafter "Ireland"(U.S. Patent No. 6,222,666) in view of Huber (U.S. Patent NO. 5,802,514). Claims 6, 14, and 24 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Ireland, Huber, and further in view of Hahn et al., hereinafter "Hahn"(U.S. Publication No. US2002/0152293). Claims 7, 9, 15, 17, and 25 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Ireland, Huber, and further in view of Della-Libera et al., hereinafter "Della-Libera" (U.S. Publication No. US2003/0023609). Claim 18 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Ireland, Huber, further in view of Guthery (U.S. Patent No. 6,567,915). Claim 27 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Ireland, Huber, and further in view of Smith et al., hereinafter "Smith", (U.S. Publication No. US2002/0167543). Applicants respectfully traverse these rejections based on the following discussion.

A.   The Rejection Based on Ireland in view of Huber

The Office Action relies upon the paragraph appearing in column 10, lines 36-42 of Ireland as disclosing the claimed limitation "editing results of said query form and saving changes of data contained in said worksheet grid form in a database of said server" as defined by independent claims 1, 10, and 19. However, as explained in greater detail below, it is Applicants' position that this paragraph in Ireland only discloses the claimed

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sending of a request to a server and receiving tabular result sets back in response to to the request and does not disclose any editing of such results and/or saving such changes in the database as in the claimed invention.

More specifically, the last sentence of the paragraph appearing in column 10, lines 36-42 of Ireland only states that Ireland uses JDBC (Java Database Connectivity) "for sending requests to the component transaction server for receiving tabular result sets back." This language clearly describes a communication where a client makes a request to a data server and where tabular result sets are returned to the client. There is nothing in this sentence or in the remainder of the quoted paragraph (or any other portion of Ireland) that discloses the additional claimed process of editing the results of the query and saving changes back in the database of the server.

The paragraph appearing in column 10 lines 36-42 of Ireland begins by stating that the client can generate components graphically (first sentence) and then explains that the client can generate a stub, for a Java component (second sentence). As noted above, in the third sentence of this paragraph the stub employs Java Database Connectivity to send requests to the component transaction server in order to receive tabular result sets back. It is Applicants' position that this paragraph therefore clearly describes a client making a request to a data server and tabular results being returned in response to the request. There is simply nothing in the Ireland reference which would teach or suggest to one ordinarily skilled in the art a process of editing the results of the query and saving changes back to the database of the server as the claimed invention does.

Therefore, Applicants respectfully disagree with the conclusion in the Office Action that Ireland and Huber teach or suggest the ability to modify the query result set on the workstation and commit those changes back to the database server. To the contrary, Huber and Ireland focus on the ability to generate and execute dynamic read-only queries. Therefore, it is Applicants' position that the combination of Ireland and Huber does not teach or suggest "editing results of said query form and saving changes of data contained in said worksheet grid form in a database of said server" as defined by independent claims 1, 10, and 19.

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More specifically, as explained in paragraph 47 of the application, and as shown in Figure 2 of the application, the invention is web-based and has user-friendly GUIs using a form-type format for creating secure complex queries based on selection of table(s), columns, and constraints, running the queries to create a snapshot of the database 160 data on their workstation, and editing the results of the query on their workstation 150, and when all edits are complete, saving the changes on the archival database 160. The prior art of record does not teach or suggest editing the results of the query on their workstation 150, and when all edits are complete, saving the changes on the archival database 160.

Further, as described in paragraph 67 of the application, if desired, changes to the data on their workstation 150 can be performed by inserting, deleting, or updating rows; importing data from the clipboard or from files; and by using editing features such as find/replace and copy/paste features, which are provided in the SCPS Java applet, and which execute in a browser environment. Applicants' Figure 7C shows item 757 that represents the editing of the worksheet including common functions such as inserting, deleting, updating, importing, replicating, calculating, etc. possibly using imported user data 756.

To the contrary, column 10, lines 36-43 of Ireland addresses the use of JDBC for sending queries to the database server and retrieving a result set back to the client workstation. More specifically, in Ireland on the client side, the user is able to generate a component graphically (e.g., using PowerBuilder or other visual development environment). For a Java component, the system of Ireland generates a stub. The stub, which resembles a Java class, include employs JDBC for sending requests to the component transaction server for receiving tabular result sets back. Thus, Ireland does not address the editing of the result set on the client, nor the committing of these changes back to the database server.

Further, Ireland, in column 8, lines 21-31, discloses editing results, but only when bound to data-aware controls (such as Power Builder) that automatically commit data changes at a time not controlled by the end-user, and without user control over the handling of errors and data conflicts. More specifically, that portion of Ireland provides

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that, in the Result Set module 224, the CTS 221 provides tabular result sets, thus making the environment very desirable for business applications. Ireland explains that, in most component-based systems, a component interface returns an object. CTS components can return either an object or a collection of objects called a "result set." The format of a result set is based on the standard ODBC result set, and it is roughly equivalent to a database cursor. Because they return a result set, CTS components are much simpler and more efficient to work with. For instance, result sets can be bound directly to data-aware controls such as a PowerBuilder, DataWindow, a Sybase, PowerJ Grid control, or any data-aware control that can be bound to an ODBC result set. In this fashion, GUI development with CTS is nearly identical to traditional two-tier systems. The CTS 221 automatically manages partial refreshes and updates of the result set.

Huber is principally directed to the utilization of a drag-and-drop interface and is referred to in the Office Action for teaching providing a response in worksheet grid form. Therefore, the Office Action does not propose that Huber teaches (nor does Huber teach or suggest) the claimed feature of "editing results of said query form and saving changes of data contained in said worksheet grid form in a database of said server" as defined by independent claims 1, 10, and 19. Thus, any combination of Ireland and Huber would not teach or suggest the invention defined by independent claims 1, 10, or 19.

Therefore, it is Applicants position that independent claims 1, 10, and 19 are patentable over the prior art record. Further, dependent claims 2-5, 8, 11-13, 16, 20-23, and 26 are similarly patentable, not only by virtue of their dependency from a patentable independent claim, but also by virtue of the additional features of the invention define. In view the forgoing, the Examiner is respectfully requested to reconsider and withdraw this rejection.

B.   The Rejection Based on Ireland, Huber and Hahn

The Office Action refers to Hahn as teaching comparing two similarly structured tables in order to overcome a similar lack of teaching in Ireland and Huber. It is Applicants' position that Hahn discloses the comparison of data in the same table over a

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period of time, to determine differences in data due to revisions. However, Hahn does not cure the deficiency of Ireland and Huber discuss above. More specifically, Hahn does not provide any teaching or suggestion of the claimed feature of "editing results of said query form and saving changes of data contained in said worksheet grid form in a database of said server" as defined by independent claims 1, 10, and 19. Therefore, any combination of Ireland, Huber and Hahn would not teach or suggest the invention defined by independent claims 1, 10, and 19, and it is Applicants' position that such claims are patentable. Further, dependent claims 6, 14, and 24 are similarly patentable not only because they depend from a patentable independent claim, but also because of the additional features they define. Therefore, the Examiner is again requested to reconsider and withdraw this rejection.

C.   The Rejection Based on Ireland, Huber, and Della-Libera

The Della-Libera reference is utilized for disclosing cascaded mass changes for the purpose of merging and/or copying rows. However, Della-Libera is not referred to for teaching or suggesting (and does not teach or suggest) the feature that is missed by Ireland and Huber as explained above. More specifically, Della-Libera omits any teaching of "editing results of said query form and saving changes of data contained in said worksheet grid form in a database of said server" as defined by independent claims 1, 10, and 19. Therefore, it is Applicants' position that independent claims 1, 10, and 19 are patentable over the proposed combination of Ireland, Huber, and Della-Libera. Dependent claims 7, 9, 15, 17, and 25 are patentable because they depend from a patentable independent claim and also because of the features each of these dependent claims define. Therefore, once again, the Examiner is requested to reconsider and withdraw this rejection.

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D.   The Rejection Based n Ireland, Huber, and Guthery

The Guthery reference is utilized for disclosing partitioning the database into private and public databases. However, Guthery is not referred to for teaching or suggesting (and does not teach or suggest) the feature that is omitted by Ireland and Huber as explained above. More specifically, Guthery does not teach "editing results of said query form and saving changes of data contained in said worksheet grid form in a database of said server" as defined by independent claims 1, 10, and 19. Therefore, it is Applicants' position that independent claims 1, 10, and 19 are patentable over the proposed combination of Ireland, Huber, and Guthery. Dependent claim 18 is patentable because it depends from a patentable independent claim and also because of the features claim 18 defines. Therefore, once again, the Examiner is requested to reconsider and withdraw this rejection.

E.   The Rejection Based on Ireland, Huber, and Smith

The Smith reference is utilized for disclosing a JAVA programming language. However, Smith is not referred to for teaching or suggesting (and does not teach or suggest) the feature that is left out by Ireland and Huber as explained above. More specifically, Smith skips any teaching of "editing results of said query form and saving changes of data contained in said worksheet grid form in a database of said server" as defined by independent claims 1, 10, and 19. Therefore, it is Applicants' position that independent claims 1, 10, and 19 are patentable over the proposed combination of Ireland, Huber, and Smith. Further, dependent claim 27 is patentable because it depends from a patentable independent claim and also because of the features claim 27 defines. Therefore, once again, the Examiner is requested to reconsider and withdraw this rejection.
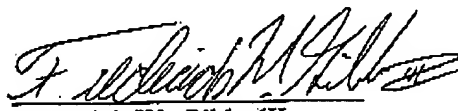
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III.   Formal Matters and Conclusion

In view of the foregoing, Applicants submit that claims 1-3, 5-11, 13-21, and 23-27, all the claims presently pending in the application, are patentably distinct from the prior art of record and are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue at the earliest possible time. Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary.

Please charge any deficiencies and credit any overpayments to Attorney's Deposit Account Number 09-0458.

Respectfully submitted,

Dated: 2/3/04

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